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*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

**LAURA A. GADDY**, individually  
and on behalf of all others  
similarly situated,

*Plaintiffs,*

**v.**

**CORPORATION of THE  
PRESIDENT OF THE CHURCH  
OF JESUS CHRIST OF LATTER-  
DAY SAINTS**, a Utah  
corporation sole.

*Defendant*

**Proposed “PRAYER FOR  
RELIEF AMENDMENT” to the  
PROPOSED 2AC**

(DEMAND FOR JURY TRIAL)

Case No: **2:19-cv-00554-RJS-DBP**

Presiding Judge: Robert J. Shelby

Magistrate Judge: Dustin B. Pead

Add to the end of ¶277 in the allegations of the proposed 2AC:

277. “LAURA GADDY, and upon information and belief many if not most members of the putative class, financed their individual unpaid missions, whether in whole or in part. Some have financed missions of others, including but not limited to their children and grandchildren.”

**PRAYER FOR RELIEF**

422. WHEREFORE, Plaintiff LAURA GADDY, individually and on behalf of the Class, prays for the following judgment:

423. An order certifying the Class as defined above, appointing Plaintiff LAURA A. GADDY as the representative of the Class, and appointing her counsel, Kay Burningham, as Class Counsel; and

424. An award of special damages in the actual out-of-pocket monetary loss from such violations in the sum of the amount that Plaintiff and each class member has paid in tithing, donations to the Church except for fast offering donations, tuition at LDS colleges and/or universities, and mission expense paid individually and for their children or others, over the course of their affiliation with the LDS Church; and,

425. An award of special damages for the time each class member spent on his or her mission and MTC at the U.S. minimum wage rate during the time of that service, for at least 75 hours per week; and,

426. An award of reasonable attorneys' fees and non-taxable costs to be paid out of the common fund prayed for above; and,

426. Attorneys' fees and litigation expenses as items of special damages;

and,

427. As to the RICO claim: Treble damages pursuant to 18 U.S.C.A. §1964(c); Attorney fees and costs pursuant to 18 U.S.C.A. §1964(c);

and,

428. General Damages, including emotional distress, for causes of action other than under RICO; and

429. Punitive damages for common law and statutory fraud-based claims except RICO; and

430. For prejudgment interest on all damages fixed as of a particular time and [that] can be calculated with mathematical accuracy, which includes tithing, donations to Defendant or its subsidiaries other than local fast offerings, hours spent in missionary service including the MTC, out-of-pocket expenses for counseling due to their faith crisis or impending divorce caused largely by one spouse's faith crisis, and in accordance with Utah law: and,

431. For post judgment interest at the judicial rate; and,

432. For such other and further relief that the Court may deem reasonable and proper.

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### **JURY DEMAND**

433. Plaintiff LAURA GADDY, individually and on behalf of the prospective class, requests a trial by jury of all claims that can be so tried.

Respectfully Submitted,

Dated: the 28<sup>TH</sup> of May 2021

by: /s/ Kay Burningham  
Kay Burningham

*Attorney for Laura A. Gaddy*